

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

LEILA GREEN LITTLE, JEANNE	§	Civil Action No. 1:22-cv-00424-RP
PURYEAR, KATHY KENNEDY,	§	
REBECCA JONES, RICHARD DAY,	§	
CYNTHIA WARING, AND DIANE	§	
MOSTER,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
LLANO COUNTY, RON CUNNINGHAM,	§	
in his official capacity as Llano County	§	
Judge, JERRY DON MOSS, in his official	§	
capacity as Llano County Commissioner,	§	
PETER JONES, in his official capacity as	§	
Llano County Commissioner, MIKE	§	
SANDOVAL, in his official capacity as	§	
Llano County Commissioner, LINDA	§	
RASCHKE, in her official capacity as Llano	§	
County Commissioner, AMBER MILUM,	§	
in her official capacity as Llano County	§	
Library System Director, BONNIE	§	
WALLACE, in her official capacity as	§	
Llano County Library Board Member,	§	
ROCHELLE WELLS, in her official	§	
capacity as Llano County Library Board	§	
Member, RHONDA SCHNEIDER, in her	§	
official capacity as Llano County Library	§	
Board Member, and GAY BASKIN, in her	§	
official capacity as Llano County Library	§	
Board Member,	§	
	§	
Defendants.	§	

**DECLARATION OF JEANNE PURYEAR IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Jeanne Puryear, declare:

1. I make this declaration based on personal knowledge. If called upon to testify, I could and would testify competently to the following facts.

2. I am a resident of Llano County. I have a library card that gives me access to books available in the County's public libraries. I have used my library card to check out books from the County's Library System for several years. I mostly read for pleasure and belong to a book club called Llano County Reading Group. Each August, we choose books for the group to read for the upcoming year. Our members read on several devices, Kindles, Nooks, iPads, and my favorite, an actual book to hold in my hands. We also read a variety of genres: fiction, historical fiction, nonfiction, memoirs, mysteries, cookbooks, and more.

3. I know that several books were removed from Llano County's physical library collection, including at least the following books: (1) *Caste: The Origins of Our Discontent* by Isabel Wilkerson; (2) *They Called Themselves the K.K.K.: The Birth of an American Terrorist Group* by Susan Campbell Bartoletti; (3) *Spinning* by Tillie Walden; (4) *In the Night Kitchen* by Maurice Sendak; (5) *It's Perfectly Normal: Changing Bodies, Growing Up, Sex and Sexual Health* by Robie Harris; (6) a read-aloud picture book series including *My Butt is So Noisy!*, *I Broke My Butt!*, and *I Need a New Butt!* by Dawn McMillan; (7) a read-aloud picture book series including *Larry the Farting Leprechaun*, *Gary the Goose and His Gas on the Loose*, *Freddie the Farting Snowman*, and *Harvey the Heart Has Too Many Farts* by Jane Bexley; (8) *Being Jazz: My Life as a (Transgender) Teen* by Jazz Jennings; (9) *Shine* by Lauren Myracle; (10) *Gabi, a Girl in Pieces* by Isabel Quintero; and (11) *Freakboy* by Kristin Elizabeth Clark. I cannot check out these books because they are no longer on library shelves or in the Llano County library

catalog. I would check out these books from the Library System in the future if they were returned to library shelves.

4. I have also attempted to access OverDrive with my County library card without success. I would use my County library card to access ebooks and audiobooks on OverDrive in the future if access to OverDrive were reinstated.

5. I am a former member of the County's library board and was fired from this position when the Commissioners Court decided to appoint new board members earlier this year. While I served on the library board, all of our meetings were open to the public. I learned from a former Llano County librarian that in the decades before this year, the County's previous library boards had always held their meetings in public.


6. On December 2, 2021, Rochelle Wells sent an email to me and several others entitled, "Re: Library concerns, update." A true and correct copy of this email is attached as **Exhibit 1.**

7. When the County discontinued the purchase of actual books last year, disconnected the ebooks selection on OverDrive, and appointed a new library board seemingly intent on dismantling the entire Library System, I was stunned at first. Now I am angry. I feel cheated and taken advantage of because I pay County taxes that are supposed to support our public libraries when all they have done is destroy them. The County's censorship is denying me of my constitutional rights, and I will never accept that.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: May 8, 2022

By:

DocuSigned by:  
  
E1392315DAE7465  
Jeanne Puryear

# EXHIBIT 1

**From:** [Rochelle Wells](#)  
**To:** [Bonnie N Wallace](#)  
**Cc:** [Eva Carter](#); [Paula Graham](#); [Rhonda](#); [JoLeigh Ares](#); [Carolyn Stovall](#); [Carol Limmer](#); [Jackie Cherico](#); [Robyn Tibbs](#); [Lynsi Herron](#); [Elysia Tarver](#); [Jeanne Puryear](#); [Kathy Oles](#); [Jo Anne Mims](#); [Patricia Donahy](#); [Cindy Campbell](#); [Sidonie Thornton](#); [Chris Jones](#); [Patricia Richards](#); [Edgar Patricia \(Patti\)](#); [Katy Scarborough](#); [Rhonda](#)  
**Subject:** Re: Library concerns, update  
**Date:** Thursday, December 2, 2021 5:39:38 PM

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Hope ya'll had a blessed Thanksgiving. We have much to be thankful to Jesus for right now:

I spoke with Commissioner Don today and he gave me some updates on the library book situation.

As a background, a few of us were able to attend the commissioners meeting (thank you all so much for going!!!) and I was personally able to use Chpt. 24 of the Penal Code (thank you, JoLeigh!) to make a case for the removal of the books that contained anything sexually explicit (written or visual), as it would be a misdemeanor under the Penal Code. I included the ebooks as well. The offending books can technically be checked out by minors since they are "young adult" books.

There was a woman there, who spoke after me, to defend the books and essentially was saying that we were calling for censorship. Commissioner Don called her out and asked her what she thought pornography was exactly. She would not say what it was, that was different for everyone -- the commissioner proceeded to tell her the he was tired of people throwing that word out and that it did not apply to this situation, that whether it be heterosexual or homosexual in nature, that it needed to go so that children wouldn't be exposed to these books. He also stood up in our defense in saying that the librarians thought that parents did not have a right to see what their children took out (this idea was called a rumor in the powerpoint Judge Cunningham put together). He gave his example of questioning the librarians himself and being told just as much as what Bonnie had told us the Kingsland librarian had said. Commissioner Don truly is a God-send!!

Back to the updates: Commissioner Don would like some of us to show support at the Dec 13th Commissioners Meeting because he will be leading a discussion on 3 items.

The first is substituting OverDrive with a system that support our library only, so we choose the books. (Currently we share Overdrive with 50 libraries, which could be why Gender Queer and Lawn Boy are available.) If that is not an option then no ebooks until it can be remedied.

The second topic is closing the library to the public for 3 days, days which are entirely devoted to removing those books that contain pornographic content. I emailed the commissioner a copy of Chris Jones' excel sheet with the books she found, so hopefully that will help also. (Thank you, Chris!!)

The third topic is about a Library Advisory Board. The Judge had mentioned this briefly at the last commissioners meeting. It is solely for the purpose of revamping the policy and procedure for the library that hasn't been updated since 2006. It will be by appointment, not for whoever wants to join - which is good because we were worried about that.

I hope several of ya'll can join me at the commissioners meeting on Dec 13th. If you have a moment, please send an email or call Commissioner Moss to thank him. Oh, and I can't leave out that the same lady who tried to call "censorship" also tried to get a meeting with the judge and he told her that there wasn't a reason to meet as both times she spoke she had made it clear where she stood and the judge made it clear where he stood with the books. That was very nice to hear. I will be at the Tea Party meeting tonight and will be thanking him for this.

Please continue to pray for Commissioner Don and Judge Cunningham and the librarians.

Rochelle Wells

Pray for your enemies; bless those who curse you.